

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Bridging the Digital Divide for Low-Income Consumers)	WC Docket No. 17-287
)	
Lifeline and Link Up Reform and Modernization)	WC Docket No. 11-42
)	
Telecommunications Carriers Eligible for Universal Service Support)	WC Docket No. 09-197
)	

REPLY COMMENTS OF THE OGLALA SIOUX TRIBE

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OST PROPOSALS

Discussion starts
at page

Tribes Should Make ETC Determinations in the First Instance, Subject to Approval by the Commission	3
Directors of the Programs that Are Used by the Commission and USAC as Proxies for Lifeline/Link Up Eligibility Should Be Accepted as Third-Party Verifiers	4
For Efficiency, Lifeline Re-Certifications Should be Batch Processed on a Quarterly Basis	6
Establish ONAP as an “Ombudsman” to Address Service-Affecting Problems in an Expedited Manner	7
Allow Facilities-Based Providers on Tribal Lands to Use Link Up and Lifeline to Buy Smartphones	8
Specifically Target the Deployment of Radio Towers as a USF-Funded Activity	9
OST Opposes the Proposal for a Self-Enforcing Budget	9
Do Not Impose Mandatory Subscriber Contribution – It Has Been Tried on Pine Ridge, and Resulted in Considerable Harm to the Population	10
Fund Construction of 4G Radio Towers	13
OST Opposes Benefit Limits	15

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The Oglala Sioux Tribe (“OST” or “Tribe”), by its Utilities Office and its pro bono telecom counsel, and pursuant to the Commission’s Notice of Proposed Rule Making and Notice of Inquiry in FCC 17-155 (“*Lifeline Reform Order*”) and deadline extension in DA 18-62, hereby submits its comments regarding further reforms to the Lifeline and Link Up universal service programs.

I. BACKGROUND ON THE OGLALA SIOUX TRIBE

The Pine Ridge Reservation of the Oglala Sioux Tribe is comprised of almost 21,000 people,¹ spread over 3,469 square miles – an area larger than the states of Delaware and Rhode Island combined.² It is one of the poorest places in the country – in its largest county, Oglala Lakota County, currently 53.9% of the population lives below the poverty line.³ The combination of a remote rural area, a highly dispersed population, and a lack of discretionary

¹ <https://www.census.gov/data/tables/time-series/dec/cph-series/cph-t/cph-t-6.html>

² https://en.wikipedia.org/wiki/Pine_Ridge_Indian_Reservation

³ https://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml#

income have been enormous barriers to deployment of basic – much less advanced – telecom services.

Three local exchange carriers provide wireline service to various parts of the Pine Ridge Reservation. But the predominant means of communication on the Reservation is via cell phone – both voice and text. Prior to the introduction of cellular service on Pine Ridge – by Western Wireless, starting in 2001 – telephone penetration was less than 50%, according to the Oglala Sioux Tribal Council.⁴

The Tribe has some point-to-point wireless broadband services in place, provided by an independent service provider. One of the ILECs serving Pine Ridge has announced fiber-to-the-home initiatives. Pine Ridge also is the home to Thunder Valley, an exciting model community development that includes advanced data and telecom services in its homes. The Tribe welcomes the introduction of such services and service providers, which have proven to be, or promise to be, innovative and valuable service providers on the Reservation. But given the size of Pine Ridge, and the dispersion of its population, wireless service will be the technology that brings both voice and data services to the greatest number of Pine Ridge residents.

AT&T Mobility is the wireless provider for most of the Reservation, and it was awarded ETC status by the Commission in 2011.⁵ Under a service agreement negotiated between the Tribe and AT&T in 2016, AT&T introduced an innovative and unique Lifeline-funded service to eligible Pine Ridge residents, and it was immediately hugely popular – over 3,400 Pine Ridge residents signed up in the first few months after the service was introduced. Over the last seven

⁴ *Western Wireless Corporation Petition for Designation as an Eligible Telecommunications Carrier for the Pine Ridge Reservation in South Dakota*, CC Docket No. 96-45, FCC 01-284 (Oct. 5, 2001) at ¶ 9 n.23.

⁵ *Petition of AT&T Mobility for Designation as an Eligible Telecommunications Carrier Pursuant to Section 214(e) of the Communications Act and Transfer of the Alltel Pine Ridge Reservation Eligible Telecommunications Carrier Designation*, WC Docket No. 09-197, DA 11-859 (released May 11, 2011).

months, problems with re-certification have caused service to be terminated to more than half of these Lifeline service subscribers, but the Tribe is currently in discussions with the Commission to obtain waivers of the re-certification rules so that service can be restored to these subscribers, and to establish a third-party verification system to handle re-certification on a going-forward basis. These comments, among other things, discuss the third-party verification program being established by the Tribe.

II. SPECIFIC PROPOSALS

Below, OST lists specific proposals for adoption by the Commission. For ease of reference by Commission Staff, OST follows the format of the NPRM and NOI Sections of the *Lifeline Reform Order*.

NOTICE OF PROPOSED RULEMAKING

V(A): Respecting the States' [AND TRIBES'] Role in Program Administration

In the NPRM section of the *Order*, the Commission seeks “comment on ways to encourage cooperative federalism between the states and the Commission to make the National Verifier a success.” ¶ 54. The Tribe fully supports this goal, but the “cooperative federalism” cited by the Commission must expressly be expanded to include Tribes.

OST Proposal: Tribes Should Make ETC Determinations in the First Instance, Subject to Approval by the Commission

The Commission correctly notes that concerns of federalism, as well as the state’s more intimate knowledge of the needs of its citizens, compels a cooperative approach to ETC administration. These same concerns apply equally to Tribal governments, sovereign entities with more intimate knowledge of conditions on the Reservations than the Commission. The Commission can respect Tribal sovereignty by accepting designations of ETC status made by

Tribes. The Commission may then review such designations to ensure compliance with federal rules and policies. Not only will this process acknowledge and respect Tribal sovereignty, it will require service providers seeking ETC status to appeal directly to the Tribes. This will encourage meaningful consultation with the Tribes and will require service providers to shape their services to meet the specific needs of the Tribes.

V(A)(2): Partnering with States [AND TRIBES] for the Successful Implementation of the National Verifier

and

V(C)(2): Improving Program Integrity in Eligibility Verification

The Commission states that “we seek comment on ways to ensure the Commission can partner with states to facilitate the successful implementation of the National Verifier.” ¶ 59.

“How can we encourage states to work cooperatively with USAC to avoid unnecessary costs?”

¶ 61. “Should new rules be adopted regarding subscriber recertification?” ¶ 97.

The Commission will find that the Tribes are willing – indeed anxious – to set up effective third-party verification systems that take the burden of re-certification off individual subscribers.

OST Proposal: Directors of the Programs that Are Used by the Commission and USAC as Proxies for Lifeline/Link Up Eligibility Should Be Accepted as Third-Party Verifiers

In the recent experience of the OST, re-certification by Lifeline Service subscribers faces too many cultural and logistical obstacles to be a viable method of certifying continuing eligibility:

- The preferred means of facilities-based wireless service providers to notify subscribers of their re-certification obligation is voicemail. But Tribal members on Pine Ridge generally don’t use voicemail, and most don’t enable that feature on their phones. The

predominant means of communications via phone on Pine Ridge is texting, but service providers do not normally use that method of alerting customers.

- Service providers are not equipped to provide notice in Lakota, meaning that many Pine Ridge residents – particularly older residents – who speak only Lakota are unable to receive notice of the re-certification obligations.
- In order to re-certify, subscribers have to click on a link on a website, and respond to a few questions. This is a simple and straightforward task in many households, but not in areas where poverty is endemic. Most Pine Ridge residents do not have computers or wi-fi access at home, and would be unable to use the website method of re-certifying.
- The provider of most 4G service on Pine Ridge is AT&T, and AT&T maintains a store in Pine Ridge Village, the largest town on the Reservation. But Pine Ridge is larger than Delaware and Rhode Island combined, and most residents do not have cars, and so in-person re-certification is an insurmountable task for most Pine Ridge residents.
- The winters in South Dakota are brutal, and create an additional obstacle to re-certification.

The Tribe manages or assists Tribal members with certain programs that serve as proxies for Lifeline eligibility, and believes that these programs maintain the data necessary for reliable third-party verification. In particular, the OST Tribal Food Distribution Program, BIA General Assistance and Head Start programs are all well-established on Pine Ridge, are all accepted by the Commission as proxies for Lifeline eligibility, and maintain the data necessary to assist in initial qualifications when Pine Ridge residents first sign up for service, and to re-certify eligibility thereafter. The OST President and Business & Economic Development Committee support this approach.

The Tribe's consultants are in the process of conducting interviews with the directors of these programs to determine which are the best candidates to serve as third-party verifiers. This involves an analysis of the data each program maintains, how often it is updated, the quality controls in place, and how the data could be accessed by AT&T and eventually the National Verifier when rolled out in South Dakota. The consultants are scheduled to report to the full OST Tribal Council at the end of March, and again at the end of April. Once this initial information is compiled, the Tribe and its consultants will reach out to Commission Staff for direction on how best to present their proposal and discuss implementation. The Tribe fully expects this to occur by the end of this summer.

OST Proposal: For Efficiency, Lifeline Re-Certifications Should be Batch Processed on a Quarterly Basis

Current practice on Pine Ridge requires re-certification on a subscriber-by-subscriber basis. That calls for a “rolling re-certification” process, as individual subscribers are verified on the anniversary of the date they signed up for the service. Such a rolling process may be overly burdensome for the directors of the Tribal programs that OST proposes to use as third-party verifiers. For the sake of efficiency, the Tribe may recommend that subscribers be grouped by which quarter of the year they signed up, so that the program directors can run quarterly verification reports. Quarterly, as opposed to rolling, verification would not present an unreasonable risk of waste – any such risk would be outweighed by the increased accuracy and reliability of the program directors' reports, as opposed to the current reliance on self-reporting.

V(B)(1): Focusing Lifeline Support to Encourage Investment in Broadband-Capable Networks

“Lifeline support can serve to increase the ability to pay for services of low income households. Such an increase can thereby improve the business case for deploying facilities to

serve low-income households. In this way, Lifeline can serve to help encourage the deployment of facilities-based networks by making deployment of the networks more economically viable.”

¶ 65 “Have Lifeline resellers passed through all Lifeline funding to their underlying carriers to ensure federal funding is appropriately spent on the required ‘facilities and services’ rather than non-eligible expenses like free phones and equipment?” ¶ 72

The Tribe agrees wholeheartedly with the Commission’s focus on making network deployment economically viable. In a place as large and thinly-populated as Pine Ridge, there is not enough demand and discretionary income to attract multiple service providers. In such cases, it makes sense to use Lifeline and Link Up to create demand for service. This will generate a “network effect” in which the Tribal population uses the service more and more, and creates additional demand. For service providers in extremely high-cost areas, such as Pine Ridge, service volume is critical to making service available and investing in network infrastructure – margins on individual services are thin, but generating large volumes of customers can generate enough revenue to justify additional network infrastructure.

OST Proposal: Establish ONAP as an “Ombudsman” to Address Service-Affecting Problems in an Expedited Manner

Yesterday, OST filed a Petition for Reconsideration of an order that granted a partial waiver of the Commission’s re-certification rules. The Tribe will not recount the story here, but because of cultural and logistical problems with re-certification by Tribal subscribers to Lifeline-supported service, the Tribe experienced a massive loss of service. Following extensive negotiations between the Tribe and AT&T, an innovative Lifeline-supported 4G service was introduced in 2016, and was immediately hugely successful – over 3,400 residents of the Pine Ridge Reservation signed up. However, due to problems with re-certification, AT&T was forced to turn off service to 1,719 of those subscribers. Before the first subscriber was turned off, OST

President Scott Weston sent a letter to the Commission seeking emergency relief, and other Tribal representatives made repeated contacts with the Commission, but it took seven months before the Commission took action. By then it was too late – more than half the subscribers had been shut off. Given that the generation of high volumes of demand is the key to making funds available for infrastructure development on Pine Ridge, this massive reduction of service has been incredibly harmful to the Tribe.

To avoid such devastating failures of process in the future, the Tribe urges the Commission to empower its Office of Native Affairs and Policy to act as an ombudsman – to coordinate among the Tribe, the service provider, and USAC to quickly identify problems when they arise, and to take temporary action on an expedited basis. Given ONAP’s deep familiarity with Tribes and the telecom challenges they face, ONAP would be highly effective in this role. A model of such action is the “rocket docket” proceeding that was implemented by the Enforcement Bureau in the past – the Commission has demonstrated the ability to address service emergencies on an expedited basis in the past, and it needs to do so now.

OST Proposal: Allow Facilities-Based Providers on Tribal Lands to Use Link Up and Lifeline to Buy Smartphones

The Tribe is cognizant of the fact that there has been substantial fraud and abuse in the Lifeline and Link Up subsidies, and that the Commission has found multiple examples of USF funds going to non-essential equipment purchases, such as computers and cell phones. In these cases it makes sense to distinguish between the USF-supported “service” and extraneous “equipment.” This distinction, however, does not make sense in the case of 4G wireless service, in which a smartphone is integrally incorporated into the service. Moreover, for severely impoverished populations, like those on Pine Ridge, requiring the service subscriber to buy a smartphone is an insuperable barrier.

In the case of 4G service – and future services even more advanced – supported by Lifeline, Lifeline and Link Up funds must explicitly be available to fund smartphones on Tribal lands. OST fully supports the adoption of protections that will ensure against abuse, while making Lifeline and Link Up available to buy smartphones. For example, the Commission could make such funding available through facilities-based 4G carriers, while other service providers would be required to make a showing to become eligible for the funding.

OST Proposal: Specifically Target the Deployment of Radio Towers as a USF-Funded Activity

As noted in the Background section above, Pine Ridge is larger than the states of Delaware and Rhode Island combined. Cellular service on Pine Ridge currently is provided over 10 cell towers.

In order to achieve a network effect, and reach the types of service volumes that will generate funding to make significant infrastructure investments, service has to be available where people need it. The deployment of new cell towers will immediately increase the usefulness of the 4G service – both retail and Lifeline-supported – and will increase subscribership.

V(D): Adopting a Self-Enforcing Budget

“We therefore propose to replace the approach adopted in the *2016 Lifeline Order* and require an annual cap for Lifeline disbursements.” ¶ 105.

OST Proposal: OST Opposes the Proposal for a Self-Enforcing Budget

OST, like virtually every Indian-affiliated entity filing comments and the majority of all commenters, opposes the automatic budget caps and arbitrary phase-out terms proposed by the Commission. Because this issue is the subject of so much commentary, the Tribe will not

discuss the issue at length. But OST does observe that the Commission – like other agencies of the federal government – has a trust obligation to Indian Tribes.

The Commission has long recognized that “the federal government has a federal trust relationship with Indian Tribes, and this historic trust relationship requires the federal government to adhere to certain fiduciary standards in its dealings with Indian Tribes. In this regard, the Commission recognizes that the federal government has a longstanding policy of promoting tribal self-sufficiency and economic development as embodied in various federal statutes.”⁶ In July of last year, Chairman Pai addressed the National Congress of American Indians, and began by acknowledging that trust responsibility: “I honor and embrace that trust relationship and my responsibilities as the Chairman of the FCC.”⁷ Reduction of desperately needed Lifeline and Link Up universal service subsidies to the Oglala Sioux Tribe or other Tribes would violate this fiduciary responsibility and would constitute a breach of both treaty-based and statutory federal obligations.

V(E): Maximum Discount Level (¶ 112)

“We seek comment on whether to apply a maximum discount level for Lifeline services above which the costs of the service must be borne by the qualifying household.” ¶ 112.

OST Proposal: Do Not Impose Mandatory Subscriber Contribution – It Has Been Tried on Pine Ridge, and Resulted in Considerable Harm to the Population

The Tribe is familiar with bromides like: “If Tribal members have skin in the game, they’ll value the service more,” and “Requiring at least partial payment will encourage responsibility.” These, like the assumptions underlying the “maximum discount level” proposal,

⁶ *Policy on Establishing a Government-to-Government Relationship with Indian Tribes*, Policy Statement, FCC 00-207, June 23, 2000.

⁷ Remarks of FCC Chairman Ajit Pai at the National Congress of American Indians Mid-Year Conference, June 14, 2017, https://apps.fcc.gov/edocs_public/attachmatch/DOC-345347A1.pdf.

are false. They demonstrate a lack of understanding of the realities of life in an impoverished and remote rural area, and generate highly damaging unintended consequences. The Oglala Sioux Tribe knows this because it has experienced it firsthand.

Prior to AT&T becoming the cellular service provider on Pine Ridge, service was provided by Alltel Communications. They provided USF-supported service pursuant to a “dollar deal” in which the Pine Ridge subscriber had to pay one dollar a month for the service. This seemingly innocuous requirement led to a number of extremely adverse and unintended consequences:

- With about half of its population living below the poverty line, most residents of Pine Ridge do not have bank accounts or credit cards. This means payment has to be made in cash in person or by mail. As noted above, Pine Ridge is larger than the states of Delaware and Rhode Island combined. Alltel had one store on Pine Ridge – in Pine Ridge Village in the southeast corner of the Reservation. The obligation to make monthly trips to the office for a token payment is extremely burdensome. Payment by mail is equally problematic for households that do not usually correspond by that method, requiring impoverished subscribers to buy stamps and make trips to post the letters. In addition, many households on the Reservation do not have standard addresses, and mail service on the Reservation is unreliable, particularly during the harsh winters.
- If a subscriber missed a \$1 monthly payment, service was shut off. Alltel then imposed a \$35 “reconnect fee” to turn the service back on. Multiple late payments incurred multiple \$35 fees. So a seemingly innocuous \$1 payment became something unaffordable to many Pine Ridge residents.

- If a payment was missed, Alltel reported it to the credit agencies. So Tribal members later found that they could not qualify for loans or financing for cars or houses, and some were disqualified from job applications, for bad credit reports based on nominal fees.

These issues became a widespread hardship on Pine Ridge, and were a constant focus of complaints at Tribal Council meetings.

Finally, the imposition of a payment obligation necessarily brings with it the termination of service for nonpayment. This is fundamentally at odds with the Commission's longstanding focus on the public safety value of having phone service in remote areas. When it transferred Alltel's ETC status on Pine Ridge to AT&T, the Commission noted: "access to wireless service will mitigate the health and safety risks associated with living and working in a remote and rural location, where consumers must often drive significant distances for work, school, medical attention, or other needs."⁸ Indeed, Pine Ridge is a vast, remote area with incredibly harsh winters, where lack of phone service has resulted in deaths from hypothermia, in cars that broke down on the road, or in homes where the heater failed. Why would the Commission risk a loss of service to people living in these conditions for a nominal payment?

NOTICE OF INQUIRY

VI(A¶): Lifeline Support that Targets the Digital Divide

"We seek comment on:

- whether the Commission should shape its Lifeline support structure to provide enhanced support in areas where providers do not have sufficient incentive to make available affordable high-speed broadband service. ¶ 123.

⁸ *Petition of AT&T Mobility for Designation as an Eligible Telecommunications Carrier Pursuant to Seciton 214(e) of the Communications Act and Transfer of the Alltel Pine Ridge Reservation Eligible Telecommunications Carrier Designation*, WC Docket No. 09-197, DA 11-859 (released May 11, 2011), at ¶ 18.

- whether the Lifeline program could better reach nonadopters of broadband by focusing Lifeline support in areas where providers need additional incentive to offer high-speed broadband service. ¶ 124.
- rural Tribal areas in which affected stakeholders have suggested that the current Lifeline Tribal enhanced subsidy amount is insufficient to incentivize broadband deployment in rural Tribal areas. ¶ 125.
- whether and how the Commission should also target Lifeline support to bring digital opportunity to low-income areas where service providers have less incentive to invest in facilities or offer robust broadband offerings compared to other areas. ¶ 127.
- changes . . . to the Lifeline program support structure to target support to underserved areas? Are there specific pricing or other data we could use to determine the appropriate support amount for underserved areas?” ¶ 129

OST Proposal: Fund Construction of 4G Radio Towers

The primary focus of OST for the use of Lifeline and Link Up subsidies at this time is the development of infrastructure to support the 4G Lifeline Service that the Tribe created with AT&T. The Tribe is very satisfied with the quality and terms of that service, and believes that the extension of the service to as many eligible Pine Ridge residents as possible is the most impactful and quickest way to get broadband and advanced telecom services into the hands of underserved Tribal members. Expanding the coverage area for the service is the optimal way to reach new customers in the most remote areas of Pine Ridge, that currently do not have access to broadband (much less reliable voice service). The Tribe estimates that at least 5,000 Pine Ridge residents would be eligible for the Lifeline Service if they had access to it.

As discussed above, the first major impediment facing the expansion of the Lifeline Service comes from unanticipated difficulties in re-certification. As discussed, the Tribe is developing a detailed plan for a reliable third-party verifier system, and is in ongoing discussions with the Commission about its implementation.

The second biggest impediment is the lack of radio towers. As discussed above, Pine Ridge is larger in square miles than Delaware and Rhode Island combined, and is currently served by 10 cell towers. Note that the Tribe does not expect to light up the entire Reservation – that would be cost-prohibitive and would not yield commensurate public benefits. But increasing the tower count significantly would ensure strong signal coverage in all populated areas, and along the most travelled roads that cross the most difficult terrain. This would address the risk of death from hypothermia that is a real risk to Pine Ridge residents every winter.

Currently, there is no source for funding for such towers. The Tribe has talked to some of the country's largest independent tower builders/operators, but because there is only a single service provider in most areas of the Reservation, the revenues from tower space rentals are not adequate to justify the construction expense. No carrier has expressed interest in pursuing Tribal Mobility Funding for Pine Ridge.

Using USF funding to build radio towers would require a dramatic change to the system, but it would be enormously cost-effective. A single tower costs about \$150,000, and generates a signal with a diameter of approximately 10 miles. See Attachment A, providing cost estimate for three separate types of towers. Moreover, this is a one-time cost – the Tribe and its consultants have determined that only the cost of deployment needs to be covered because tower rental fees, even from only one carrier, are adequate to cover the cost of maintenance.

Moreover, the deployment of such infrastructure could attract competition. The Tribe has had discussions with facilities-based 4G carriers who were not willing to build network in Pine Ridge, but would consider entry if infrastructure was in place.

VI(B): Benefit Limits

“We next seek comment on whether the Commission should implement a benefit limit that restricts the amount of support a household may receive or the length of time a household may participate in the program.” ¶ 130.

OST Proposal: OST Opposes Benefit Limits

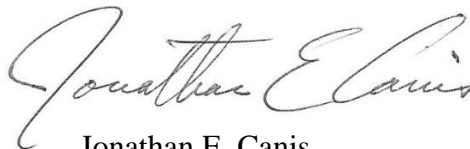
OST opposes benefits limits as a violation of the Commission’s trust responsibility and the federal government’s commitments under treaties and statutes. Rather than repeat its arguments, please see the discussion under “OST Opposes the Proposal for a Self-Enforcing Budget” at page 10 above.

III. CONCLUSION

For the reasons discussed above, the Oglala Sioux Tribe respectfully requests that the Commission amend its rules governing Lifeline and Link Up support consistent with the foregoing comments.

Respectfully submitted,

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ATTACHMENT A

CELL TOWER TYPES AND COSTS

The 3 main cell tower types are illustrated below. The type selected will depend on required height, how much land is available, and the physical characteristics of land.

Costs are similar for each, due to a trade-off of steel costs (higher for monopole) vs. installation labor costs (higher for lattice and guy wire). A typical cost breakdown is:

• Cost of steel:	\$35,000
• Base plate & foundation:	\$35,000
• Backhaul equipment:	\$25,000
• Installation:	\$40,000
• Emergency generator/battery backup:	\$5,000
• FCC licensing:	<u>\$10,000</u>
	\$150,000



GUY-WIRE



LATTICE



MONOPOLE